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7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

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10 UNITED STATES OF AMERICA, ) Case No: 2:20-cr-286-JCM-NJK  
11 Plaintiff, )  
12 vs. ) **SEVENTH STIPULATION TO  
13 KAREN CHAPON, ) MODIFY CONDITIONS OF RELEASE**  
14 Defendant. )

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15 IT IS HEREBY STIPULATED AND AGREED, by and between Jason Frierson, United  
16 States Attorney, and Jessica Oliva, Assistant United States Attorney, and Rene L. Valladares,  
17 Federal Public Defender, and Brian Pugh, Assistant Federal Public Defender, counsel for Karen  
18 Chapon, that Ms. Chapon's pretrial release travel condition be amended to allow Ms. Chapon to  
19 travel to Colorado as outlined below.

20 This stipulation is entered into for the following reasons:

21 1. On March 11, 2022, the Court modified Ms. Chapon's pretrial release conditions  
22 to expand her travel restriction to include travel California with prior Pretrial Services approval.  
23 ECF No. 79. This modification was made to allow Ms. Chapon to travel to California for work  
24 and to care for her elderly mother. *Id.*

2. Since the Court granted the modification, Ms. Chapon's mother moved to Colorado.

3. Ms. Chapon requests that her travel restriction be modified to also permit her to travel to Colorado for the purpose of caring for her mother with prior Pretrial Services Approval.

4. Ms. Chapon's Pretrial Services Officer does not object to this modification to her release conditions.

5. The parties agree to this modification.

Dated this 20th day of September 2022.

RENE L. VALLADARES  
Federal Public Defender

JASON FRIERSON  
United States Attorney

By /s/ Brian Pugh  
BRIAN PUGH  
Assistant Federal Public Defender

By /s/ Jessica Oliva  
JESSICA OLIVA  
Assistant U.S. Attorney

ORDER

IT IS SO ORDERED.

BRENDA WEKSLER  
United States Magistrate Judge

DATED: September 21, 2022